

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Heather Picquelle,)	
)	
Plaintiff,)	Case No.: 23-cv-16340
)	
v.)	Judge John F. Kness
)	
The Partnerships, and Unincorporated)	
Associations Identified on Schedule "A",)	
)	
Defendants.)	

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO THE COMPLAINT**

Defendant #198 WENY Store ("Defendant" hereinafter), by and through the undersigned counsel, hereby move for an extension of twenty-one days from March 29, 2024 to respond to the Complaint (D.E. 1), through and including April 19, 2024, and in support thereof state as follows:

1. On November 29, 2023, Plaintiff filed its Complaint. (D.E. 1).
2. On March 8, 2024, Plaintiff reported Return of Service. (D.E. 22).
3. Defendant has only recently retained counsel and requires additional time to review the facts and law in the instant case before drafting a responsive pleading.
4. Defendant has not previously requested an extension from this Court.
5. Defendant’s counsel has contacted Plaintiff’s representative, Adam Grodman, by email on March 27, 2024, who is not opposed to the extension.
6. Good cause exists to grant this motion. Defendant’s request for additional time to respond to the Complaint in this motion is not intended to cause undue delay. Moreover, no party will be prejudiced by the relief requested herein.

WHEREFORE, Defendant respectfully request that the Court grant this motion and extend the time for Defendant to respond to the Complaint for twenty-one days from March 29, 2024 to respond to the Complaint (D.E. 1), through and including April 19, 2024 and grant such further relief as the Court deems just and proper.

Respectfully submitted this 29th day of March, 2024.

By: /s/ Michael T. Stanley

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